

Emeroo BESS Statement of Environmental Objectives

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Emeroo BESS

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Table of Contents

1.0	Introduction	1
	1.1 Project Background	1
	1.2 Project Site	1
	1.3 Project Description	2
2.0	Report Purpose	5
3.0	Report Scope	5
4.0	Environmental Objectives and Assessment Criteria	6
5.0	Incident Reporting and Management Framework	13
6.0	Mitigation Strategies	14
	6.1 Management Plans	14
	6.2 Adaptive Management Approach	15
	6.3 Compliance with Regulatory Requirements	15
	6.4 Reporting	15
	6.5 5 Yearly Review	15
7.0	Conclusion	15

1.0 Introduction

Emeroo BESS Pty Ltd (being a related entity of Potentia Energy) (formerly Enel Green Power Australia)(the proponent) is investigating the opportunity to develop a 225MW/900MWh Battery Energy Storage System (BESS) (the Project) at the Bungala Solar Farm.

Potentia Energy is seeking to obtain an Associated Infrastructure Licence (the Licence) for the Project under the *Hydrogen and Renewable Energy Act 2023* (HRE Act). An Associated Infrastructure Licence Application was lodged with the Department for Energy and Mining (DEM) on 1 October 2024.

To support the assessment of the Licence Application an Environmental Impact Report (EIR) is required to be prepared pursuant to Section 61 of the HRE Act and Regulation 32 of the *Hydrogen and Renewable Energy Regulations 2024* (HRE Regulations). An EIR has been prepared in accordance with the above legislative requirements which includes the Environmental Impact Assessment Criteria which was Gazetted on 31 October 2024 and the following associated draft DEM guidance documents:

- *Environmental Impact Assessment Criteria Guideline, HRE Act July 2024*
- *Environmental Impact Assessment Criteria: Requirement under Part 4 of the HRE Act. July 2024*

The EIR developed environmental objectives and assessment criteria for all potential impacts of the project.

These Objectives must also be addressed in the Statement of Environmental Objectives (SEO) (this report) as a requirement under Regulation 34 of the HRE Regulations.

The SEO has been developed based on information provided in the EIR, and provides transparency about the proponent's required environmental performance.

1.1 Project Background

The Bungala Solar Farm was approved in 2016 under the former *Development Act 1993* (Development Application Number 010/V031/16) and comprised of a 300MW solar farm and associated infrastructure. The approved solar farm comprised three stages.

Stages 1 and 2 have been developed and are operational with a total connection capacity of 220MWac

Since the original approval, a number of variations to the Development Approval were obtained for the Project, one of which included the addition of a BESS. In 2021 an approval for a 40MW/40MWh BESS was obtained, however, proceeding with this BESS option is not feasible, and thus, Potentia Energy is proposing the development of a significantly larger BESS – this Project, which is named the Emeroo BESS.

Due to changes in legislation a Licence under the HRE Act is now required for the Project, noting that the previous Development Approval recognised the suitability of the site for a BESS, albeit of smaller scale.

The Project has been strategically located within the Bungala Solar Farm adjacent to the ElectraNet Emeroo Substation, thereby allowing the development to connect directly and efficiently into the grid whilst also minimising the environmental impact of the Project given the developed nature of the site and its remote setting.

1.2 Project Site

The Bungala Solar Farm is located approximately 10 kilometres to the north-east of Port Augusta.

The existing solar farm is divided into two sections, with the Bungala One Solar Farm (B1) located in the southern portion of the site and the Bungala Two Solar Farm (B2) located in the north portion. The two solar farms are separated by a central access road.

The Project site is located within the boundary of the solar farms, on existing cleared land adjacent to the site entrance.

The BESS is to be sited within the north-eastern corner of B1 and will connect to the ElectraNet Emeroo Substation, which is located to the north within the south-eastern corner of B2.

The BESS site is approximately 7.65 hectares in area and is located on land formally identified as:

- Allotment 100 in Filed Plan 163829, contained within Certificate of Title Volume 5313 Folio 872

The Emeroo Substation is located on the following adjoining parcel of land:

- Allotment 99 in Filed Plan 163829, contained within the Certificate of Title Volume 5313 Folio 872 – Emeroo Substation

Both allotments are owned by the Bungala Aboriginal Corporation. Potentia Energy has executed an Access Licence and Call Option to Lease Land Agreement with Bungala Aboriginal Corporation to enable the development of the BESS.

The Bungala Solar Farm is located within the Nukunu (Area 2) Native Title Determination area.

The footprint of the State Heritage listed Former Ostrich Farm, Emeroo Station, including Original Homestead, Ruins of Hatching Shed, Exotic Plants and Ostrich Fences, extends through centre of the Bungala Solar Farm. This footprint relates to the location of the Ostrich Fences. While no fence elements remain adjacent to the site and impacts to the State Heritage Place are unlikely, potential impacts to unknown remaining heritage items have been included in the assessment (see Figure 1).

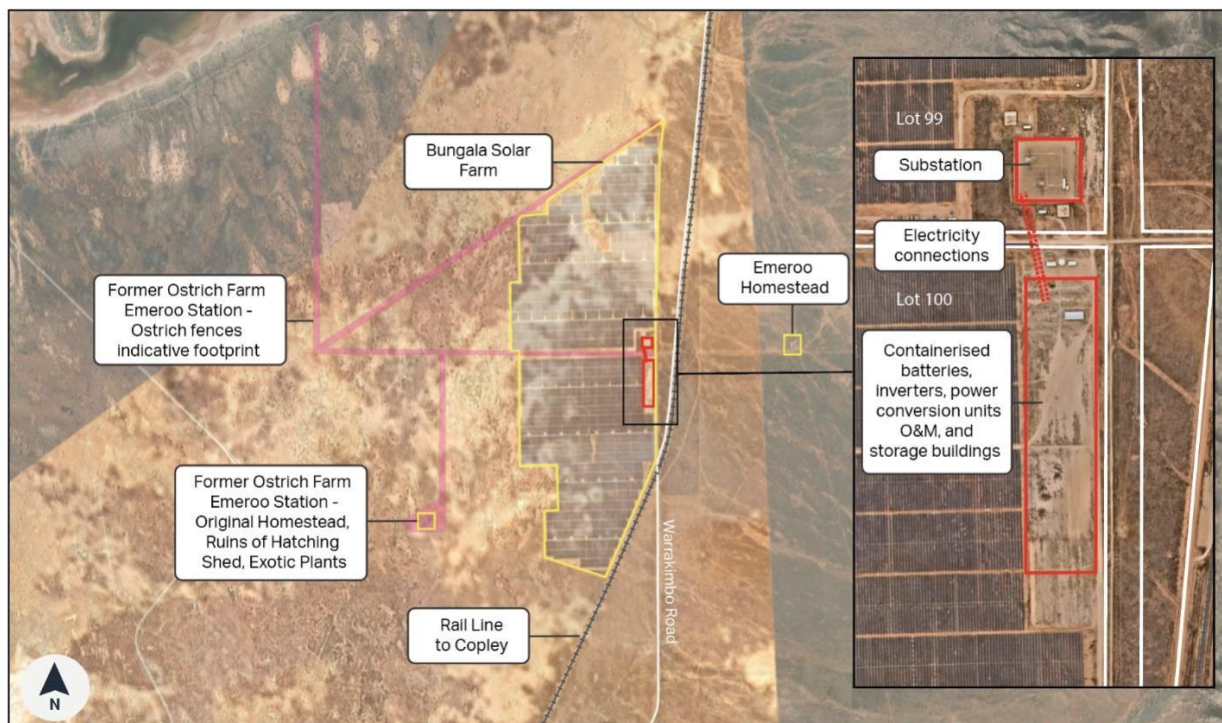


Figure 1 Project Site and Locality

1.3 Project Description

The proposed development comprises a 225MW/900MWh BESS to be located at the Bungala Solar Farm.

The BESS will comprise:

- Containerised batteries, inverters and power conversion units
- Switchroom and harmonic filter
- O&M and storage buildings

- Electricity connections to the existing ElectraNet Emeroo Substation, including switchyard upgrades/additional infrastructure within the existing substation
- Associated fencing, access and site works
- Decommissioning of the BESS and site rehabilitation

An indicative layout is provided in Figure 2. The final layout will be subject to detailed design considerations.



Figure 2 Proposed BESS Layout

2.0 Report Purpose

An SEO is required pursuant to Section 62 of the HRE Act.

The purpose of the SEO is to establish a framework for environmental management at the site throughout the project's lifecycle. This document summarises the project's commitment of minimising environmental impacts and ensuring compliance with relevant environmental guidelines and standards. The SEO summarises specific environmental objectives and aims to guide project activities in an appropriate manner.

3.0 Report Scope

Section 62 of the HRE Act requires that a Statement of Environmental Objectives must:

- (2) (a) *address the matters contained in the environmental impact report; and*
- (b) *set out the following:*
 - (i) *environmental objectives that must be achieved in undertaking authorised operations to which the statement will apply;*
 - (ii) *leading performance criteria*
 - (iii) *immediately reportable incidents and reportable incidents (both within the meaning of section 47); and*
- (c) *include, as an objective, the rehabilitation of land adversely affected by the authorised operations; and*
- (d) *contain any other information prescribed by the regulations.*

The scope of the SEO includes all phases of the Emeroo BESS project, including planning, construction, operation and eventual decommissioning, and applies to all project activities.

The SEO must state the environmental objectives to be achieved by the project, as well as the assessment criteria to assess if these objectives have been achieved, in order to provide transparency to stakeholders regarding what is required of the proponent in terms of environmental performance requirements.

Pursuant to Section 62(7) of the HRE Act, the SEO becomes a condition of the licence that must be complied with.

4.0 Environmental Objectives and Assessment Criteria

Table 1 outlines objectives, assessment criteria, guides to achieving objectives and leading performance criteria to ensure the project is developed in an environmentally responsible manner while addressing community needs and expectations while promoting sustainability.

Components of the assessment include:

- Impact ID – a code corresponding to the Impact ID's used in the EIR.
- Potential Impact Event – a potential impact event is the combination of a source, a pathway and an environmental receptor.
- Environmental Objective – objectives that must be achieved in carrying out the project activities, as identified by the EIR
- Assessment Criteria – measures used to assess whether the proposed environmental objective has been achieved by the proponent
- Guides to Achieving Objectives – examples of control and mitigation measures to assist in achieving each Environmental Objective
- Leading Performance Criteria – criteria used to give an early warning that a control or other strategy necessary for compliance with an SEO (a) is absent; (b) may fail or be failing. Leading performance criteria must be developed for impacts where there is a high level of reliance on control measure strategies to achieve an environmental objective.

Table 1 Environmental objectives and assessment criteria for potential impacts

Impact ID	Potential Impact Event	Environmental Objective (s)	Assessment Criteria	Guides to Achieving Objectives	Leading Performance Criteria
Aboriginal Heritage					
AH1	Damage or disturbance of unregistered Aboriginal heritage sites, objects, remains and/or other places.	No damage, disturbance or interference to Aboriginal sites, objects or remains.	<p>Avoid damage, disturbance or interference to Aboriginal sites, objects or remains as required by the SA <i>Aboriginal Heritage Act 1988</i>.</p> <p>Where damage or interference to Aboriginal heritage is unavoidable then application for authorisation in accordance with section 23 of the <i>Aboriginal Heritage Act 1988</i> will be sought.</p> <p>Where unexpected heritage discoveries occur, discoveries are to be reported to Aboriginal Affairs & Reconciliation Attorney-General's Department (AAR) as soon as reasonably practical in accordance with section 20 of the <i>Aboriginal Heritage Act 1988</i>.</p> <p>Discoveries of potential human remains must be reported to SAPOL immediately via 131 444.</p>	<ul style="list-style-type: none"> Develop Heritage Management Plan Establish unexpected finds protocol Conduct heritage induction and regular training for all personnel <p>Where damage is unavoidable:</p> <ul style="list-style-type: none"> Authorisations under the Aboriginal Heritage Act 1988 are sought Appropriate consultation with Aboriginal parties Employ Risk management approach (limited to avoiding and protecting the heritage). 	<p>Heritage Management Plan is adhered to and effective.</p> <p>All ground disturbance work will be undertaken in accordance with agreed Heritage Management Plan. Activities confined to existing cleared areas.</p> <p>Training and induction for all personnel to educate on the importance of heritage controls.</p> <p>Procedures, systems and plans in place if heritage values encountered.</p>
Non-Aboriginal Heritage					
NAH1	Impacts to unknown heritage elements of The Ostrich Farm (State Heritage Place)	No impact to the State Heritage Place	<p>Avoid any impact to the State Heritage Place as per the <i>Heritage Places Act 1993</i>.</p> <p>Where unexpected discoveries occur, adhere to the requirements of the <i>Heritage Places Act 1993</i></p>	<ul style="list-style-type: none"> Implement mitigation measures through CEMP Establish unexpected finds protocol Conduct heritage induction and regular training for all personnel <p>Where damage is unavoidable:</p>	<p>CEMP is adhered to and effective.</p> <p>All ground disturbance work will be undertaken in accordance with the CEMP.</p>

Impact ID	Potential Impact Event	Environmental Objective (s)	Assessment Criteria	Guides to Achieving Objectives	Leading Performance Criteria
			<i>and Planning, Development and Infrastructure Act 2016.</i>	<ul style="list-style-type: none"> Adhere to the requirements of the <i>Heritage Places Act 1993</i> and <i>Planning, Development and Infrastructure Act 2016.</i> Employ Risk management approach (limited to avoiding and protecting the heritage). 	<p>Activities confined to existing cleared areas.</p> <p>Training and induction for all personnel to educate on the importance of heritage controls.</p> <p>Procedures, systems and plans in place if heritage values encountered.</p>
Air Quality					
AQ1	Dust from construction activities and vehicle movements are a nuisance to local residents and other users of Warrakimbo Road.	No public nuisance impacts from dust as a result of construction activities.	<p>No public nuisance impacts from dust as a result of construction activities.</p> <p>Procedures, controls, and reporting requirements in relation to air quality to be outlined in the CEMP.</p> <p>A Traffic Management Plan will be established to reduce air quality impacts associated with vehicle movements.</p> <p>Stakeholder complaints related to dust are documented and reasonable steps taken to resolve complaints can be demonstrated.</p>	<ul style="list-style-type: none"> Establish Traffic Management Plan including controls for the number of truck movements per day Implement dust suppression management measures such as watering of roads through CEMP Establish stakeholder complaints management procedure including documentation No unresolved reasonable complaints 	<p>Traffic management plan developed in collaboration with local government and is adhered to.</p> <p>Dust suppression measured addressed in the CEMP are adhered to.</p> <p>Consultation with local residents on implementation of dust suppression.</p>
AQ2	Fire originating from the BESS Facility	No injuries, deaths or adverse risk to public or third party health and safety as a result	<p>Compliance with fire management systems and procedures.</p> <p>Procedures, controls, monitoring, reporting and auditing</p>	<ul style="list-style-type: none"> Ensure compliance with all relevant standards and requirements including the <i>Fire and Emergency Services Act 1998</i> Conduct regular fire safety audits, document incident 	<p>Comprehensive fire management plans included in the CEMP and OEMP are adhered to and effective.</p> <p>Auditing demonstrates compliance.</p>

Impact ID	Potential Impact Event	Environmental Objective (s)	Assessment Criteria	Guides to Achieving Objectives	Leading Performance Criteria
		<p>of fire or smoke from the BESS</p> <p>No adverse impact to native vegetation surrounding the site as a result of fire for the BESS</p>	<p>requirements in relation to bushfire risk and control and ongoing operational fitness to be conducted in accordance with the approved CEMP and OEMP, including a Bushfire Management Plan and Emergency Management Plan</p>	<p>reports, and document compliance with regulations</p> <ul style="list-style-type: none"> • Appropriate fire-fighting equipment to be available on site and maintained, including dedicated firewater storage • Employ weatherproof design elements to reduce the risk of water ingress and short-circuiting, with consideration of the challenges in extinguishing fires in affected racks • Implement fire prevention procedures such as designated smoking areas, operational procedures, firebreaks and regular inspections of vegetation • Implement additional fire considerations for high fire danger days and periods of drought • Conduct regular fire safety and emergency response training for all personnel • Implement safety, testing, maintenance and inspection procedures for firefighting equipment • Obtain any necessary permits such as safe work permits • Regularly review and update fire safety and emergency response procedures 	

Impact ID	Potential Impact Event	Environmental Objective (s)	Assessment Criteria	Guides to Achieving Objectives	Leading Performance Criteria
Traffic					
T1	Increased traffic on local roads	No adverse impacts to local road uses during the construction phase.	<p>A Traffic Management Plan will be established to implement traffic management strategies to reduce impacts associated with construction vehicle movements.</p> <p>Stakeholder complaints related to dust are documented and reasonable steps taken to resolve complaints can be demonstrated.</p>	<ul style="list-style-type: none"> Implement management procedures to reduce impacts through a Traffic Management Plan. Establish stakeholder complaints management procedure including documentation No unresolved reasonable complaints. 	Traffic Management Plan developed in collaboration with local government and is adhered to.
Noise					
N1	Local residents disturbed by noise due to construction activities.	No public nuisance impacts from noise as a result of construction activities.	<p>No public nuisance impacts from noise as a result of construction activities.</p> <p>Procedures, controls, and reporting requirements in relation to construction noise to be outlined in the CEMP.</p> <p>Compliance with the SA EPA Environment Protection (Commercial and Industrial Noise) Policy 2023.</p> <p>Stakeholder complaints related to noise are documented and reasonable steps taken to resolve complaints can be demonstrated.</p>	<ul style="list-style-type: none"> Compliance with noise regulations and effective noise control measures as required Establish stakeholder complaints management procedure including documentation No unresolved reasonable complaints. 	<p>Construction noise management addressed in the CEMP are adhered to.</p> <p>Site activities planned and undertaken to minimise disturbance to local community.</p> <p>Infrastructure and equipment operated and maintained in accordance with manufacturer specifications.</p>

Impact ID	Potential Impact Event	Environmental Objective (s)	Assessment Criteria	Guides to Achieving Objectives	Leading Performance Criteria
N2	Local residents disturbed by noise on an ongoing basis.	No public nuisance impacts from noise as a result of operation.	<p>No public nuisance impacts from noise as a result of operation.</p> <p>Procedures, controls, monitoring, reporting and auditing requirements in relation to operational noise and ongoing operational fitness to be conducted in accordance with the approved OEMP.</p> <p>Compliance with the SA EPA Environment Protection (Commercial and Industrial Noise) Policy 2023.</p> <p>Stakeholder complaints related to noise are documented and reasonable steps taken to resolve complaints can be demonstrated.</p>	<ul style="list-style-type: none"> • Compliance with noise regulations and effective noise control measures as required • Implement design features to reduce noise profile • Investigate implementation of noise reducing applications at the receptor • Establish stakeholder complaints management procedure including documentation • No unresolved reasonable complaints. • Demonstrate (through noise modelling) that noise levels do not exceed the indicative noise levels for Rural Zone as set out in Appendix 1 of the Indicative noise factor guidelines for the Environmental Protection (Commercial and Industrial Noise) Policy 2023: -57dB(A) during the day -49dB(A) during the night. 	<p>Operational noise management addressed in the OEMP and adhered to.</p> <p>Site activities planned and undertaken to minimise disturbance to local community.</p> <p>Infrastructure and equipment operated and maintained in accordance with manufacturer specifications.</p> <p>Noise levels do not exceed indicative noise levels.</p>
Rehabilitation					
General	Land disturbed and affected by regulated activities	Rehabilitate land adversely affected by regulated activities	OMP includes a decommissioning and rehabilitation plan (or similar) that outlines how any infrastructure or equipment will be decommissioned and the land rehabilitated to as near as possible to its undisturbed state.		Decommissioning and rehabilitation plan addressed in the OMP and adhered to.

Impact ID	Potential Impact Event	Environmental Objective (s)	Assessment Criteria	Guides to Achieving Objectives	Leading Performance Criteria
Native flora and fauna					
FF1	Increased risk of weed and pest incursion	No additional weed or pest impact to surrounding environment	<p>Management of declared weeds should be in accordance with requirements of the LSA Act.</p> <p>A Waste Management Plan will form part of the CEMP, including measurements to prevent pest predator species from being attracted to the site or having access to waste.</p>	<ul style="list-style-type: none"> Implement Weed and Pest Management Plan Implement Waste Management Plan 	<p>Weed and pest management will be addressed in the CEMP and adhered to.</p> <p>Training for personnel on importance of weed and pest controls.</p>
FF2	Increased risk of weed and pest incursion	No additional weed or pest impact to surrounding environment	<p>Management of declared weeds should be in accordance with requirements of the LSA Act.</p> <p>A Waste Management Plan will form part of the OEMP, including measurements to prevent pest predator species from being attracted to the site or having access to waste.</p>	<ul style="list-style-type: none"> Implement Weed and Pest Management Plan Implement Waste Management Plan 	<p>Weed and pest management will be addressed in the OEMP and adhered to.</p> <p>Training for personnel on importance of weed and pest controls.</p>

5.0 Incident Reporting and Management Framework

Under Section 62(2)(b)(iii) of the HRE Act, the SEO must '*set out immediately reportable incidents and reportable incidents*'.

Table 2 outlines the approach to incident reporting in accordance with Section 47 of the HRE Act, including the requirement for reporting incidents, examples of environmental incidents, and the procedures which must be following by the licensee to ensure compliance with the Act.

Table 2 Incident Reporting Requirements

Incident Type	Definition	Incidents	Reporting
Immediately Reportable	<ul style="list-style-type: none"> An incident arising from activities conducted under a licence specified in the relevant statement of environmental objectives to be an immediately reportable incident; or Any other matter brought within the ambit of this definitions by the regulations. 	<ul style="list-style-type: none"> A person is seriously injured or killed An imminent risk to public health or safety arises. Disturbance to sites of cultural and / or heritage significance without appropriate permits and approvals An escape of a chemical, fuel or other potential contaminant to a water body, or to land in a place where it is reasonably likely to enter a water body by seepage or infiltration, or onto land that affects the health of native flora and fauna species Detection of a declared weed, animal / plant pathogen or plant pest species that has been introduced or spread as a direct result of activities. Any removal of rare, vulnerable, endangered or protected flora and/or fauna without appropriate permits and approvals Any event resulting in the activation of emergency response and/or evacuation procedures of an area or the need for emergency service personnel. 	<p>Initial Report Licensees must provide an initial report to the Minister in a manner and form prescribed by the regulations, within 24 hours after the licensee becomes aware of the occurrence of the incident.</p> <p>Comprehensive Reporting Following the initial report, licensees must provide a comprehensive report to the Minister within three months after the licensee becomes aware of the occurrence of the incident, unless the Minister specified a different timeframe for reporting a particular case.</p>
Reportable	<ul style="list-style-type: none"> An incident (not being an immediately reportable incident) arising from activities conducted under a license and specified in the statement of environmental 	<ul style="list-style-type: none"> An escape of a chemical, fuel or other potential contaminant that affects an area that has not been specifically designed to contain such an escape (other than an immediately reportable incident). Malfunction or failure of critical plant or equipment 	<p>Reporting Licensees must report incidents to the Minister in a manner and form prescribed by the regulations, within the period specified by the regulations to ensure all incidents are documented and assessed for their potential impact on</p>

Incident Type	Definition	Incidents	Reporting
	objectives to be a reportable incident; or <ul style="list-style-type: none"> • Any other matter brought within the ambit of this definition by the regulations 	that had (or still has) potential to cause an immediately reportable incident. <ul style="list-style-type: none"> • Unresolved reasonable complaints from stakeholders regarding operations. • An event where an excursion outside a culturally cleared area has occurred or the conditions of a cultural heritage clearance have not been complied with (other than an immediately reportable incident). 	environmental safety and public health.

6.0 Mitigation Strategies

To ensure the successful implementation of the project and minimise environmental impacts, the following mitigation strategies will be employed.

6.1 Management Plans

To ensure potential environmental impacts are appropriately managed during the construction and operational phases of the development, a Construction Environmental Management Plan (CEMP), Operational Environmental Management Plan (OEMP) and Decommissioning and Rehabilitation Plan will be prepared and implemented.

These plans will form part of Operational Management Plan required to be prepared pursuant to Section of 66 the HRE Act.

The CEMP will include a range of control measures to manage and minimise environmental risks during the construction phase of the project. The control measures will be specific to the site and will principally relate to the following key aspects:

- Air Quality
- Bushfire
- Cultural Heritage
- Noise
- Stormwater and Water Quality
- Traffic
- Waste Management

A specific OEMP will be prepared for the project (as required under section 66 of the HRE Act) which will describe measures to prevent or minimise environmental harm and mitigate impacts on the community. It will incorporate procedures, controls, monitoring and reporting requirements in relation to:

- Noise and vibration
- Fire risk

- Waste and pollution management
- Emergency response planning
- Complaints management

The Decommissioning and Rehabilitation Plan will guide how the infrastructure and equipment will be decommissioned and the site rehabilitated at the end of the Project life

6.2 Adaptive Management Approach

An adaptive management approach should be adopted that allows for flexibility in response to any site events or stakeholder feedback. An adaptive approach enables the project team to make informed adjustments to mitigation strategies as needed, ensuring environmental impacts are minimised throughout the project lifecycle.

6.3 Compliance with Regulatory Requirements

All mitigation strategies detailed in the CEMP and OEMP are to comply with relevant environmental regulations and standards, including adherence to guidelines provided by the Department of Energy and Mining (DEM) and other regulatory bodies. The project should ensure that it meets or exceeds legal requirements for environmental protection.

6.4 Reporting

To ensure transparency and accountability throughout the project lifecycle, a reporting framework will be established. This will include, at a minimum, Incident Reporting (see Section 5.0) and an 'Annual Compliance' operation report, as requirements for licenced operations under the HRE Act.

Regular reporting will document compliance with the SEO and allow for evaluation of the effectiveness of implemented mitigation measures.

6.5 5 Yearly Review

In accordance with HRE Regulation 36, an SEO must be reviewed by the licensee every five years. Information regarding source, pathways or receptors collected during the five-year period will allow for any uncertainty associated with the effectiveness of implemented control measures to be refined. The five yearly review process will ensure that any learnings from the Project are incorporated into the SEO to ensure best practice environmental management.

7.0 Conclusion

Potentia Energy propose to develop and operate the Emeroo BESS within the Bungala Solar Farm.

This SEO has been prepared in accordance with the relevant requirements of the HRE Act and HRE Regulations and DEM guidelines.

The EIR identified potential impact events which may occur as a result of the Emeroo Bess project, along with a proposed environmental objective for each. This SEO has outlined assessment criteria, guides to achieving objectives, and leading performance criteria for each potential impact event, providing a framework to ensure the project is developed in an environmentally responsible manner, with all risks mitigated to ALARP.